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Attorneys for Plaintiff SYNOPSYS, INC.

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8 | UNITED STATES DISTRICT COURT

9 | NORTHERN DISTRICT OF CALIFORNIA

10 | SAN FRANCISCO DIVISION

11 | SYNOPSYS, INC.,   ) Case No. CO3-02289 MJJ
)
12 | Plaintiff,   ) **DECLARATION OF GAL HASSON IN**
) **SUPPORT OF SYNOPSYS' OPPOSITION**
13 | vs.   ) **TO RICOH'S MOTION FOR ENTRY OF**
) **PROTECTIVE ORDER AND CROSS-**
14 | RICOH COMPANY, LTD.,   ) **MOTION FOR ADOPTION OF SYNOPSYS'**
) **PROTECTIVE ORDER AND DISCOVERY**
15 | Defendant.   ) **PROCEDURES**
)
16 |) Date: February 10, 2004
) Time: 9:30 a.m.
17 | _____) Ctrm: 11

18 | I, Gal Hasson, hereby declare as follows:

19 | 1.   I currently serve as Director of Product Marketing, Implementation Group, a position I

20 | have held for several years. I joined Synopsys in 1996 and started as a technical marketing manager

21 | for power, then I became a product marketing manager (PMM) for a subset of the Design Compiler®

22 | product, then later I became the PMM for all over the Design Compiler® before my promotion to the

23 | director position overseeing all over Design Compiler® and FPGA synthesis products. Prior to that I

24 | held a position at Motorola Semiconductor Israel as a CAD engineer/team leader for seven years. The

25 | matters set forth in this declaration are based upon my personal knowledge, except where otherwise

26 | indicated, and if called as a witness, I could and would testify competently thereto.

27 | 2.   Synopsys competes with other software companies in the Electronic Design Automation

28 | ("EDA") software industry. This is an intensely competitive industry. Synopsys faces challenges from

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1   a number of competitors, including: Cadence Design Systems, Magma Design Automation, Mentor

2   Graphics Corporation, Monterey Design Systems, and Synplicity, among others.
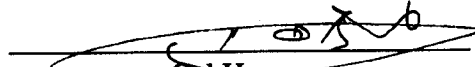
3   3.   Synopsys is the leading provider of logic synthesis software, and its Design Compiler®

4   product is the most widely deployed logic synthesis product in the world. Logic synthesis software

5   allows integrated circuit designers to rely on higher-level "register transfer level" (RTL) descriptions

6   of the circuits that they wish to build and frees them from the need to worry about exactly what circuit

7   elements must be used to implement the RTL description. Instead, the logic synthesis software

8   determines how to use the "library" circuit cells offered by a semiconductor foundry or a library

9   vendor in order to construct a circuit that will implement the RTL description provided by the logic

10 designer. The quality of this transformation from RTL into library cells reflects, ultimately, the quality

11 of the algorithms used to implement this transformation. Users evaluate the quality of the logic

12 synthesis transformation based on the speed of the resulting circuit, the size of the circuit and other

13 factors such as the power consumed. Presently, the market for logic synthesis software is

14 approximately $260M per year and of that market, the Design Compiler® software accounts for

15 $210M of the market.

16   4.   The commercial success of the Design Compiler software is due, in large part, to the

17 high quality of the circuit designs that Design Compiler generates. In order to achieve these high

18 quality results, Design Compiler utilizes a number of proprietary algorithms that Synopsys has

19 developed and improved over the approximately fifteen year period during which Design Compiler has

20 been offered as a product. Because of the commercial advantage that they confer, Synopsys treats

21 these algorithms as the most highly sensitive trade secrets. In order to protect these secrets, Synopsys

22 strictly controls who has access to the source code for its Design Compiler software.

23   5.   The risks of software theft are real and grave. There have been previous well-known

24 instances of software theft in the EDA industry. Synopsys would suffer significant injury if one of its

25 competitors was to obtain access to the logic synthesis algorithms used by Design Compiler and to

26 implement similar algorithms in their own products. Design Compiler is one of Synopsys' principal

27 "Design Implementation" software packages, and Design Implementation software contributes

28 between 40 and 50 percent of Synopsys' annual revenues, according to Synopsys' 2002 Annual

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1 Report. If Synopsys' existing competitors or a new competitor were to gain access to the trade secrets

2 contained within Synopsys' Design Compiler product, this revenue could be threatened.

3   I declare under penalty of perjury under the laws of the United States of America that the

4 foregoing is true and correct. This declaration was executed in Mountain View, California on January

5 20, 2004.

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7   Gal Hasson

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